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15 Attorneys for SAMSUNG ELECTRONICS CO.,  
LTD., SAMSUNG ELECTRONICS AMERICA,  
16 INC. and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19  
20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a  
24 Korean business entity; SAMSUNG  
ELECTRONICS AMERICA, INC., a New  
25 York corporation; SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
26 LLC, a Delaware limited liability company,

27 Defendants.  
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL**

1 Pursuant to Civil Local Rules 7-11 and 79-5, and General Order No. 62, Samsung  
 2 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications  
 3 America, LLC (collectively, “Samsung”) hereby bring this administrative motion for an order to  
 4 seal portions of Exhibit 1 to its Motion for Leave to File Three-Page Reply in Support of  
 5 Samsung’s Administrative Motion for Relief from April 29, 2013 Case Management Order, or  
 6 Alternatively, for a Hearing. Exhibit 1 consists of Samsung’s proposed Reply and includes  
 7 details from the June 24, 2013 Expert Report of Julie L. Davis, CPA, which Apple has designated  
 8 “Confidential.” Samsung expects that Apple will submit a declaration as required by Civil Local  
 9 Rule 79-5(d) establishing good cause to permit filing under seal.

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DATED: July 8, 2013

Respectfully submitted,

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Victoria F. Maroulis  
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